

**UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

NATIONAL LABOR RELATIONS BOARD \*

Petitioner,

v.

RETRO ENVIRONMENTAL, INC. \*  
and GREEN JOBWORKS, LLC. \*

Respondents. \*

Case No. 18-1245

\* \* \* \* \*

**RESPONDENT GREEN JOBWORKS, LLC'S  
ANSWER TO APPLICATION FOR ENFORCEMENT OF AN ORDER OF  
THE NATIONAL LABOR RELATIONS BOARD**

Green JobWorks, LLC, as a Respondent in the above-captioned case, hereby answers the Application for Enforcement filed by the National Labor Relations Board (herein "Board") with respect to its Decision and Order (herein "Order") issued on September 21, 2017 and reported at 365 NLRB No. 133, and states as follows:

Green JobWorks admits that this Court has jurisdiction over the Board's application pursuant to Section 10(e) of the National Labor Relations Act, as amended, 29 U.S.C. § 160(e).

Green JobWorks admits that venue in this Court is proper as the alleged unfair labor practices occurred in several locations, including Maryland.

Green JobWorks denies that the Board is entitled to enforcement of its Order. Green JobWorks states that the basis of the Board's Order in this case, namely its decision and Order in a representation proceeding reported at 364 NLRB No. 70 (2016), was not supported by substantial evidence, was procedurally in error, and was contrary to the law.

Green JobWorks further avers that the Court should deny enforcement of the Order on the grounds the Decision is not supported by controlling legal precedent.

Green JobWorks avers that the Court should deny enforcement of the Order on the grounds that it is not rational or consistent with the National Labor Relations Act, as amended, 29 U.S.C. §§ 151, et. seq.

WHEREFORE, Green JobWorks requests that the Court set aside and deny enforcement of the Order in its entirety.

Dated: March 27, 2018.

Respectfully submitted,

/s/ Patrick John Stewart

Patrick John Stewart

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## CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2018, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the appellate CM/ECF system and the same was served on all parties or their counsel of record through the CM/ECF system.

/s/ Patrick John Stewart  
Patrick John Stewart